

August 1, 2008

Martha Seaman
ADEQ
1110 W. Washington
Phoenix, Az. 85007

RE: Proposed Rules for Integrated Solid Waste Regulatory Framework

Dear Ms. Seaman;

I have been apprised of proposed changes relating to some aspects of ADEQ's rules for solid waste facilities. Although I haven't studied the entire rule packet, I have reviewed some areas that are of concern to the Coconino County Community Development Department. There are two points I would like to comment on in regard to the proposed rule package.

1. Coconino County is very happy to see that septage and grease trap waste are both specifically prohibited as materials acceptable in composting. We have had a number of complaints regarding a facility that was trying to incorporate these materials in their composting operation and it has been very difficult to pursue compliance when there was a grey area about the ability to use these materials. Clarifying their status is very helpful.
2. I did not see anything in the rules that addressed obtaining approval from the local zoning authority as part of the general regulations for facilities- particularly those operating under best management practices (R18-13-600 et seq) and those that are self-certifying (R18-13-700 et seq). Including such a requirement would be a very important and valuable addition to the rule package from our Department's perspective.

Thank you for the opportunity to comment on these rules. I realize it is a major undertaking and appreciate your efforts.

Sincerely,

Sue E. Pratt, AICP
Assistant Director